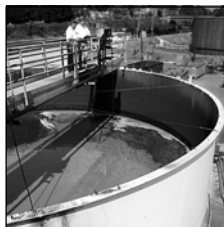


# Industrial Pretreatment Quarterly

Published for Industrial Dischargers by the King County Industrial Waste Program (KCIW)



**King County**

Wastewater Treatment Division  
**Industrial Waste Program**

Volume XXXIII Issue 3 September 2005

## Mission Statement

*The mission of the Industrial Waste Program is to protect the environment, public health, biosolids quality, and King County's regional sewerage system. We work cooperatively with our customers as we regulate industrial discharges, provide technical assistance, and monitor the regional sewerage system.*

## Industrial Waste Advisory Committee

Kevin Burrell,  
Environmental Coalition of South  
Seattle (ECOSS)  
Ken Gross, GM Nameplate  
Sandy Hallberg, Asko Processing  
Donna Hoskins, Berlex Laboratories  
Bill Hughes, Skills, Inc.  
Mike Jeffers, Rebec LLC  
Tom Raymond, Honeywell, Inc.  
Al Rainsberger, Todd Pacific  
Steve Skodje, Cargill, Inc.  
Doris Turner, Boeing Commercial  
Airplane Group - Renton  
Chris VanHoof, City of Kent  
Scott Woerman, North Creek Analytical

## 2004 Rewards and Recognition Program

(Awarded in 2005 and listed here throughout that year)

## Commitment-to-Compliance Award

B.S.B. Diversified Co.  
Boeing Electronics Center  
Smith Fabrication Inc.  
Vectra Fitness Inc.

## EMFCO wins EnvirOvation Award

Exotic Metals Forming Co. (EMFCO) of Kent is one of two King County Industrial Waste (KCIW) EnvirOvation Award winners this year. (See our June newsletter for the Ball Metal Beverage Container Corp. story.)

Exotic Metals Forming Company (EMFCO) is a Kent-based manufacturing company supplying the aerospace industry for more than 35 years. A major contributor to virtually every model of Boeing airplane in current production, the company has won international recognition for its unique, cost-effective solutions to complicated sheet metal forming challenges.

Beginning in 2001, EMFCO significantly updated its pretreatment equipment and designed a computer control system that "talks" to the new hardware. EMFCO devised a counter current rinse system and added a new pretreatment tank to balance the pH before discharging, instead of relying on the system to do this. With the new system in place by 2003, and continuous improvements and adjustments throughout 2004, the facility's

*(continued on page 5)*



EMFCO Facilities Engineer/  
Environmental Coordinator John Henry  
(top) and Vice President Doug Gines  
(below) receive award from Elsie Hulsizer,  
KCIW Program Manager.

## Inside this Issue

- EMFCO wins EnvirOvation Award
- KCIW News Briefs
- Hazardous waste generators and contractors
- 2005 Best Awards
- Meet our IWAC Board members
- New Ecology Guidance and CLARC system
- Definition of Significant Noncompliance
- Publication of recent enforcement actions

## KCIW News Briefs

### December 15 deadline for KCIW's EnviroVation Award nominations

KCIW encourages facilities to apply by December 15 for the 2005 EnviroVation Award. Awardees also become eligible to win one of King County's Green Globe Awards which recognize businesses that have demonstrated outstanding achievements in environmental stewardship.

For an application, and to learn about nomination criteria, visit: <http://dnr.metrokc.gov/wlr/indwaste/Awards.htm> on the Internet, or contact Kristin Painter at 206-263-3000 or email: [kristin.painter@metrokc.gov](mailto:kristin.painter@metrokc.gov).

KCIW's awards program supports the goals of King County's industrial waste regulations: to protect public health and the environment by preventing businesses from discharging substances that can degrade wastewater treatment, harm workers, damage facilities or reduce surface-water quality.

### ECOSS named Co-Star

The Environmental Coalition of South Seattle (ECOSS) was honored as a Co-Star by the EnviroStars program this year, in recognition of its "progressive work with businesses to properly manage and prevent wastes, and for assisting businesses to qualify for the EnviroStars Program."

ECOSS is a non-government/non-profit educational organization designed to assist businesses and the community with environmental and economic development issues. ECOSS' Kevin Burrell serves on KCIW's Industrial Waste Advisory Board. EnviroStars, a service of the Local Hazardous Waste Management Program of King County, is a program that certifies businesses for their efforts in preventing pollution and reducing hazardous waste.

*For more information on the EnviroStars program and on EnviroStars Co-Star partnerships see [www.envirostars.com](http://www.envirostars.com) or call Laurel Tomchick at 206-263-3051. For more information about ECOSS go to [www.ecoss.org](http://www.ecoss.org) or call 206-767-0432.*

### King County receives EPA Brownfields Grants

The Environmental Protection Agency (EPA) has selected King County for two brownfields assessment grants, \$200,000 for hazardous substances and \$200,000 for petroleum. The grant funds will be used to support community outreach activities, conduct initial assessments, and perform Phase I and II environmental site assessments for properties around the county, with an emphasis on the county's three Manufacturing and Industrial Centers (MICs) located in Seattle's Duwamish area/

*continued on page 3*

## Gold Award

A.O. Smith Water Products Co.  
Aero Controls Inc. - 20th Street NW  
Alaskan Copper Works - 6th Ave.  
Amgen Corp. - Bothell  
Asko Processing Inc.  
Avtech Corp.  
B.S.B. Diversified Co.  
Baker Commodities Inc.  
Ball Metal Beverage Container Corp.  
Berlex Laboratories (Washington) LLC - Bothell  
Boeing Commercial Airplane - North Field  
Boeing Commercial Airplane - Renton  
Boeing Electronics Center  
BP-Arco Petroleum  
Burlington Northern/Santa Fe Railway  
Carnitech US Inc.  
Crane-Eldec Corp. - North Creek Facility  
Exotic Metals Forming Co.  
Genie Industries - Bldgs. 3 & 4  
Glacier Northwest Inc. - Kenmore  
Hytek Finishes Co.  
I-90 Express Finishing  
Industrial Container Services Inc.  
Interstate Brands Corp. - Hostess  
Island Spring Inc.  
Kenworth Truck Company - Renton  
Magnetic And Penetrant Services Co.  
Mastercraft Metal Finishing Inc.  
Mikron Industries  
Oberto Sausage Co. - Airport Way  
Pacific Iron & Metal  
Pacific Rendering Co.  
Pepsi-Cola Co.  
Pioneer Industries  
Protective Coatings Inc.  
Quality Finishing Inc.  
Redhook Brewing Co.  
Rexam Beverage Can Co.  
Safeway Inc. - Beverage Plant  
Seattle Solid Waste - Kent Highlands  
Landfill  
Shasta Beverage  
Skills Inc.  
Smith Fabrication Inc.  
Stockpot Inc.  
Tri-Way Industries Inc.  
Universal Manufacturing

Universal Sheet Metal Inc.  
Vectra Fitness Inc.  
Western Pneumatic Tube  
Western Processing Trust Fund II  
Weyerhaeuser Co.

## Silver Award

Acu-Line Corp.  
Aerojet-General Corp.  
Art Brass Plating, Inc  
Carl Zapffe Inc.  
Cedar Grove Composting Inc.  
Circuit Services WorldWide  
Costco Wholesale  
Crane-Eldec Corp. - Martha Lake Facility  
Dawn Food Products Inc.  
Emerald Services, LLC  
GKN Aerospace Chem-tronics Inc.  
GM Nameplate Inc.  
Honeywell International Inc.  
Industrial Plating Corp.  
Kerry Inc.  
King County Solid Waste - Cedar Hills  
Landfill  
Marco Shipyard Seattle Inc.  
Northstar Beverage Co.  
Oberto Sausage Co. - Kent  
Pacific Propeller International, LLC  
Philip Environmental Services Corp.  
Puget Sound Energy Inc.  
Rabanco Recycling Co.  
TTM Technologies Inc.  
Universal Brass Inc.

*Every year, King County recognizes significant industrial users of the sewer system that have maintained an excellent record of compliance with the county's industrial waste discharge regulations for the previous calendar year. For awards criteria and more information, go to <http://dnr.metrokc.gov/wlr/indwaste/Awards.htm> on the Web.*

*King County's industrial pretreatment regulations are designed to prevent businesses from discharging substances that can degrade the wastewater treatment process, harm workers, damage facilities or reduce surface-water quality.*

*continued from page 2*

City of Tukwila; Seattle's Ballard-Interbay area; and the City of Kent.

Assessment of brownfields will help the county identify and reduce threats to the health and welfare of these communities. Eventual cleanup and redevelopment will help prevent future brownfields and promote economic benefits for county residents.

For further information visit the EPA Brownfields site at [www.epa.gov/brownfields](http://www.epa.gov/brownfields) and the King County pages at <http://www.metrokc.gov/dnrp/swd/brownfields> on the Internet.

## Upcoming IWAC Meeting, November 2

KCIW's next Industrial Waste Advisory Committee (IWAC) meeting will take place November 2 from 9 a.m. to noon. For additional information, please call the KCIW at 206-263-3000.

With the goal of protecting the environment, public health, biosolids quality and King County's regional sewerage system, KCIW's advisory committee meets to exchange ideas among representatives of industrial wastewater dischargers, sewer agencies, environmental groups, and KCIW staff.

*The meeting site is wheelchair accessible. Those who have needs or disabilities for which arrangements must be made ahead of time should get in touch with KCIW before a meeting. Telephone 206-263-3000 (voice) or the Washington Relay Service at 1-800-833-6388 or e-mail: [kristin.painter@metrokc.gov](mailto:kristin.painter@metrokc.gov).*

## EPA Streamlining Rule

As we go to print, the EPA has announced final changes to its "pretreatment streamlining" rule. Please go to <http://dnr.metrokc.gov/wlr/indwaste/news.htm> on the Internet for more information.

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*For more information contact Doug Hilderbrand, 206-263-3032 or e-mail: [doug.hilderbrand@metrokc.gov](mailto:doug.hilderbrand@metrokc.gov).*

## Industrial Pretreatment Tips

### Hazardous waste generators and contractors

The following question and answer appears in the Spring/Summer 2005 issue of the Washington State Department of Ecology's publication Shop-talk.

**Q.** When I hire a contractor to work at my site, who is responsible for dangerous wastes that are generated?

**A.** You are. Commercial property owners and managers (the dangerous waste rules do not apply to homeowners) are responsible for the dangerous wastes generated on their property. Contractors can assist you in managing the waste, but the waste would be counted towards your generator status and would need to be manifested off-site from your property for recycling or treatment. Contractors should not take wastes generated at the work site back to their shop. This activity is illegal transportation of dangerous wastes.

Contractors are responsible for wastes that originate on their own property. If a contractor generates waste at his or her own shop (e.g., to strip and re-finish salvaged wood) he or she would be generating and manifesting that resulting waste under their shop's RCRA (Resource Conservation and Recovery Act) Site Identification number.

Contractors can leave leftover paint, caulk and other materials for you to use during future maintenance because "touch-up" products are not considered waste.

*For more information go to Ecology's Demolition Debris pages: <http://www.ecy.wa.gov/programs/hwtr/demodebris> on the Internet.*

**This information is available on advance request in accessible formats for persons with disabilities.**

**Please call 206-263-3000 or TTY relay service at 1-800-833-6388.**

## 2005 Best Awards

Two Seattle companies discharging industrial wastewater and working with the KCIW won Best Awards this summer. The Resource Venture and its program partners honored 11 businesses in June at its fourth annual ceremony. The BEST (Businesses for an Environmentally Sustainable Tomorrow) Awards celebrate notable "green" achievements by companies in the Greater Seattle area.

### **The University of Washington (UW) Consolidated Laundry wins Water Conservation Award:**

UW Consolidated Laundry is a 65,000 square foot facility that annually processes approximately 10-12 million pounds of hospital linens for the UW, Harborview and Veterans' Administration medical centers, and UW Health Sciences. A 250 gallon-per-minute AquaRecycle System was designed to save the laundry approximately 18 million gallons per year. The facility projects water and energy savings to be a quarter of a million dollars annually.

The system uses natural earth media to filter contaminants from the laundry wastewater including lint, chemicals, organics, oil and grease. Disinfection of the recycled water is accomplished with a combination of ozone and ultraviolet disinfection. The clean water is returned to the washers for reuse in both hot and cold water supply. Fresh water is used in the final rinse.

By partnering with Seattle Public Utilities and Puget Sound Energy, Consolidated Laundry received more than \$363,000 for the cost of equipment and implementation of the project. This amount equaled more than 58 percent of the total cost of the project.

### **Amgen Inc. wins the Energy Conservation Award:**

Seattle's 40-acre Amgen Helix campus is a research and technology center housing 750 scientists, researchers and staff in six buildings totaling 750,000 square feet. Through a combination of integrated daylight/electric light design strategies, energy efficient luminaries, LED exit

signs and a sophisticated campus-wide lighting control system, Amgen is saving 1.4 million kilowatt-hours per year or \$78,000.

By partnering with Seattle City Light, Amgen received over \$1.2 million for the cost of equipment and implementation of these and related projects.

*The Resource Venture provides free environmental consulting services to Seattle-area businesses. It helps companies lower their utility costs, obtain rebates, comply with regulations and receive public recognition, all while protecting the environment. It is a program of the Greater Seattle Chamber of Commerce, in partnership with Seattle Public Utilities. For more information, contact the Resource Venture at 206-389-7304 or [help@resourceventure.org](mailto:help@resourceventure.org). You can also visit [www.resourceventure.org](http://www.resourceventure.org) on the Internet.*

## Meet our IWAC Board members

KCIW is presenting a series of profiles of its Industrial Waste Advisory Committee (IWAC) board members.



Al Rainsberger

Al has been with the Todd Pacific Shipyards since 1979 and is currently the manager of safety/quality and environmental compliance. Al is a Certified Hazardous Material Manager, Certified Environmental Inspector and a Certified Environmental Manager. He presides over the Puget Sound Shipbuilders Association and is vice-president of the ECOSS (Environmental Coalition of South Seattle) Board of Directors.

"I wanted to be part of the IWAC because we have a corporate vision to be the front-runners in environmental stewardship. We strive to be the

best shipyard on the West Coast and that stands true for our commitment to our environmental programs as well."

*IWAC members exchange ideas among representatives of industrial wastewater dischargers, sewer agencies, environmental groups and Industrial Waste staff about KCIW. Committee members are volunteers who represent the types of industries and agencies served by KCIW. Industrial wastewater dischargers and the public are invited to quarterly IWAC meetings. See page 3.*

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(EMFCO wins award continued from page 1)

water consumption has decreased by 90 percent. It also reduced the amount of treatment chemical usage by 50 percent.

Congratulations, EMFCO!

The awards program supports the goals of King County's industrial waste regulations: to protect public health and the environment by preventing businesses from discharging substances that can degrade wastewater treatment, harm workers, damage facilities or reduce surface-water quality. For more information about the Envirovation and other KCIW awards, go to <http://dnr.metrokc.gov/wlr/indwaste/Awards.htm> or use our contact information page 1.

## New Ecology Guidance and CLARC system

The Washington State Department of Ecology (Ecology) has published "Guidance on Remediation of Petroleum-Contaminated Ground Water by Natural Attenuation" under the Model Toxics Control Act (MTCA), chapter 70.105D RCW. The document provides technical guidance on how to understand, evaluate, select and implement cleanup action alternatives that use natural attenuation, either alone or in conjunction with other cleanup action components, to clean up petroleum-contaminated ground water.

This guidance clarifies those regulatory requirements and expectations, and provides readers with the means to determine compliance

*continued on page 6*

continued from page 5

with minimum requirements for cleanup actions set forth in WAC 173-340-360. The guidance does not, however, establish or modify regulatory requirements.

Ecology will be hosting a Natural Attenuation workshop on November 9, which will also contain a brief introduction on the interactive Ecology Web-based Cleanup Levels and Risk Calculations (CLARC) system developed recently.

For more information, go to [http://www.ecy.wa.gov/programs/tcp/policies/pol\\_main.html](http://www.ecy.wa.gov/programs/tcp/policies/pol_main.html) on the Internet. If you have any questions or comments regarding the guidance, please call 360-407-7189 or e-mail [hpar461@ecy.wa.gov](mailto:hpar461@ecy.wa.gov). The guidance can be obtained from <http://www.ecy.wa.gov/biblio/0509091.html> or by calling 360-407-7224.

## Industrial Pretreatment Tips

### Definition of terms you may regularly encounter

In wastewater treatment and pollution control we use terms that are occasionally unique to this field, and sometimes the meanings are not readily obvious. Understanding the correct definition could be the determining factor of whether or not a company is in full compliance with regulations. This is a continuation of a series of articles on the terms that KCIW believes are the most important, and sometimes the least understood. All of the terms addressed are in Chapter 28.82-Definitions of the King County Code.

Read below to learn which is the most frequently violated Significant Noncompliance criterion –yet the easiest to avoid!

#### Significant Noncompliance

In July 1990 the U. S. Environmental Protection Agency (EPA) promulgated the following definition for Significant Noncompliance (SNC):

“Significant Noncompliance” shall apply to an industrial user if its violation(s) meets one or more of the following criteria:

- a.** Chronic violations of wastewater discharge limits, defined here as those in which 66 percent or more of all of the measurements taken during a six-month period exceed - by any magnitude - the daily maximum limit or average limit for the same pollutant parameter;
- b.** Technical Review Criteria (TRC) violations, defined here as those in which 33 percent or more of all of the measurements for each pollutant parameter taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC=1.4 for BOD, TSS, fats, oil, and grease and 1.2 for all other pollutants except pH);
- c.** Any other violation of a pretreatment effluent limit (daily maximum or longer-term average) that the control authority determines has caused, alone or in combination with other discharges, interference or pass through (including endangering the health of publicly owned treatment works (POTW) personnel or the general public);
- d.** Any discharge of a pollutant that has caused imminent danger to human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority under this chapter to halt or prevent such a discharge;
- e.** Failure to meet, within 90 days after the scheduled date, a compliance schedule milestone contained in a local control mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
- f.** Failure to provide, within 30 days after the due date, required reports such as baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports and reports on compliance with compliance schedules;
- g.** Failure to accurately report noncompliance; and
- h.** Any other violation or group of violations that the control authority determines will adversely affect the operation or implementation of the local pretreatment program.”

The revised General Pretreatment Regulations (40 CFR Part 403) included, along with the new SNC criteria, public participation requirements including, at a minimum, annual publication in the largest daily newspaper of all industrial users that violate SNC criteria.

The December 1990 edition of this newsletter announced the new SNC definition and requested comments on a proposed publication policy that would allow KCIW to meet the new EPA requirements.

*The March 1991 edition of this newsletter announced this publication policy. KCIW would publish: names of all companies that the program found to meet any of the SNC criteria; names of all companies with fines; and names of all companies that have had violations that are unique in nature and thus warrant special attention.*

In the 14 years since establishment of the policy the most frequently violated SNC criterion has

been the failure to file a report within 30 days of the due date (subparagraph f.). Ironically this is also the easiest SNC criterion for companies to avoid violating—simply by notifying KCIW if it appears that a report is going to be late, and requesting an extension.

For further information, contact KCIW's Doug Hilderbrand at 206-263-3032 or email: [douglas.hilderbrand@metrokc.gov](mailto:douglas.hilderbrand@metrokc.gov). The first article in this series appeared in the June 2005 issue of this newsletter, available by contacting KCIW (information on page 1) or by going to [http://dnr.metrokc.gov/wlr/indwaste/PTQ\\_6\\_05.pdf](http://dnr.metrokc.gov/wlr/indwaste/PTQ_6_05.pdf) on the Internet.

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## Publication of recent enforcement actions

King County's Industrial Waste Program is responsible for making sure that water used by county industries returns to our waterways clean and safe. This protects our water resources, our public health, workers at treatment plants, and the biosolids produced there.

Most businesses in King County do an excellent job of meeting this clean water goal by treating their industrial wastewater before they discharge it to the sewer. Whenever possible, we work to provide technical assistance and help industries reach compliance before enforcement actions become necessary. If companies violate clean water standards, however, we do take enforcement actions, as federal regulations require.

The following companies are users of the county sewer system that violated treatment requirements between June 2005 and August 2005 (or have not had their violations previously published). They were found in significant noncompliance during the reporting period; received fines; had violations that were unique or warranted special attention; or met a combination of those actions.

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### **Puget Sound Recycling**

523 A Street SE  
Auburn, Washington 98002

**Nature of Violation/Type of Pollutant:** Discharge violations-Bis(2-ethylhexyl)phthalate, copper, lead, n-Decane, n-Octadecane, non-polar FOG.

**Basis for Publication:** Puget Sound Recycling exceeded the chronic criteria, that is, during a six-month period at least 66% or more of the measurements for copper and lead exceeded (by any magnitude) the daily maximum limit.

**Comments:** Puget Sound Recycling will have a professional engineer conduct an engineering review of their wastewater pretreatment system. The purpose of the review will be to determine what institutional and/or engineering modifications are needed to ensure compliance with discharge standards.

**Penalty:** \$2,865 post-violation charge and compliance order.

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**Other Enforcement Actions** King County Industrial Waste also acted on 5 other violations at 5 companies for the following pollutants and/or parameters: late reports (2); permit violation-failure to report valid data (1); pH-acidic (2).

We all need to work together to prevent pollution. If you have information for the Industrial Waste Program or questions about our programs, please call 206-263-3032 or 711, TTY Relay Service. You may also visit our program's pages at <http://dnr.metrokc.gov/wlr/indwaste/index.htm> on the Internet.



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*King County's Wastewater Treatment Division protects public health and water quality by serving 17 cities, 17 sewer districts and more than 1.4 million residents in King, Snohomish and Pierce counties. The regional public utility has been preventing water pollution for nearly 40 years.*



Exotic Metals Forming Co. - Industrial Waste Program  
EnviroVation Award winner

**Clean Water: A Sound Investment**